

# EXHIBIT D

**Judd Burstein**

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**From:** Tyrone Blackburn <tblackburn@tablackburnlaw.com>  
**Sent:** Wednesday, November 3, 2021 7:50 PM  
**To:** Judd Burstein  
**Cc:** Steven D. Isser; Peter B. Schalk; Victor Weberman; Emily Finestone; Steven Gordon  
**Subject:** Re: Hough v. Maraj -- Dkt. No. 210CV-04568 (E.D.N.Y.)

I see you're in a playful mood tonight Judd. I am certain you don't mean an harm, but I think it's a little inappropriate to talk about another mans wife. I would hope that this would be the last email concerning Mrs. gordon who is not a party to this action, and who, from the looks of her comment, was only contributing to a conversation which several other random individuals commented on.

Tyrone A. Blackburn, Esq.  
T. A. Blackburn Law, PLLC  
TABlackburnlaw.com

On Nov 3, 2021, at 7:19 PM, Judd Burstein <jburstein@burlaw.com> wrote:

I went back to Steven's wife's post today, as I realized that she stated that "[t]he only late response that lawyers agreed to allow is the filing of an Answer." If there was such an offer by Plaintiff's counsel, Il was unaware of it. And if Steven's wife has accurately recounted the facts, is that offer still on the table?

Judd Burstein  
Judd Burstein, P.C.  
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**MY APOLOGIES IN ADVANCE FOR ANY TYPOGRAPHICAL AND/OR GRAMMATICAL ERRORS. I AM A TERRIBLE TYPIST AND PROOFREADER – PARTICULARLY WHEN I AM DRAFTING AN EMAIL UNDER TIME PRESSURE.**

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**From:** Tyrone Blackburn <tblackburn@tablackburnlaw.com>  
**Sent:** Monday, October 18, 2021 1:37 PM  
**To:** Judd Burstein <jburstein@burlaw.com>  
**Cc:** Peter B. Schalk <pschalk@burlaw.com>; Victor Weberman <VWeberman@burlaw.com>; Emily Finestone <EFinstein@burlaw.com>  
**Subject:** Re: Hough v. Maraj -- Dkt. No. 210CV-04568 (E.D.N.Y.)

He will make the correction.

Tyrone A. Blackburn, Esq.  
T. A. Blackburn Law, PLLC.  
Phone: 347-342-7432  
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On Oct 18, 2021, at 1:07 PM, Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)> wrote:

Dear Mr. Blackburn:

I received notice that my former employee, Steven Gordon, has joined you as co-counsel. However, he has listed my firm as his place of affiliation. I do not have Steven's current email address, so I leave it to you to inform him that he must correct it **immediately**.

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**From:** Tyrone Blackburn <[tblackburn@tablackburnlaw.com](mailto:tblackburn@tablackburnlaw.com)>  
**Sent:** Wednesday, October 13, 2021 7:11 PM  
**To:** Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)>  
**Subject:** Re: Hough v. Maraj -- Dkt. No. 210CV-04568 (E.D.N.Y.)

Judd,

You can file your opposition and explain to the court why your client believes that her and her husband are above the law. I do not consent to an extension.

Regards.

Tyrone A. Blackburn, Esq.  
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On Oct 13, 2021, at 6:43 PM, Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)>  
wrote:

Dear Mr. Blackburn:

I expect to file a Notice of Appearance tomorrow on behalf of Nicki Minaj in the above-referenced action (albeit without conceding that the Court has personal jurisdiction over Ms. Minaj). I am aware that you filed a Request for a Certificate of Default on October 11, 2021. I am writing to ask that you voluntarily withdraw your request and agree to an extension of the time, until November 1, 2021, to answer or move against the Complaint. Otherwise, we will both waste

our time litigating a motion, on which Ms. Minaj will surely prevail, to set aside the default.

Please let me know whether you will agree to my request at your earliest convenience.

Judd Burstein  
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